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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
LETTER BRIEF IN OPPOSITION TO
WAYMO'S MOTION TO COMPEL
DISCOVERY AND EXHIBITS THERETO
[DKT. 1994]**

Courtroom: 8, 19th Floor
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:
1. Declaration ISO Admin. Mot. to File
Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this administrative motion for an order to file under seal portions of Otto Trucking’s Letter Brief in Opposition to Waymo’s Motion to Compel Discovery and exhibits thereto (the “Administrative Motion”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Parties Claiming Confidentiality
Otto Trucking’s Letter Brief	Highlighted Portions	Defendants (blue highlighting)
Exhibit B to the Walsh Declaration	Entire Document	Defendants Plaintiff

The highlighted portions of Otto Trucking’s Letter Brief contain information that Plaintiff Waymo LLC (“Waymo”) and Defendants Uber and Ottomotto have designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

Exhibit B to the Walsh Declaration contains information that Plaintiff Waymo LLC (“Waymo”) and Defendants Uber and Ottomotto have designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Administrative Motion and its supporting documents that merit provisional sealing.

Dated: October 17, 2017

Respectfully submitted,

By: /s/ Neel Chatterjee
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **October 17, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **October 17, 2017**.

/s/ Neel Chatterjee
NEEL CHATTERJEE